

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

NICOLE PAYNE,
Plaintiff

vs.

PROGRESSIVE FINANCIAL
SERVICES, INC.,
Defendant

§
§
§
§
§
§
§

CIVIL ACTION NO. 4:12-cv-00432-Y

**PLAINTIFF’S MOTION TO SUBSTITUTE COUNSEL
AND NOTICE OF APPEARANCE**

Plaintiff Nicole Payne (“Plaintiff”) moves to substitute and designate Noah D. Radbil as attorney-in-charge for Plaintiff in this action in place of Dennis R. Kurz. There is good cause for the unopposed substitution in that effective August 20, 2012, Mr. Kurz is no longer employed by Weisberg & Meyers, LLC.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby appears in this action as attorney-in-charge for Plaintiff, and requests that all papers and notices be served upon him at the following address:

Noah D. Radbil
Weisberg & Meyers, LLC
9330 LBJ Freeway, Suite 900
Dallas, TX 75243

Respectfully submitted,

WEISBERG & MEYERS, LLC

By: s/Noah D. Radbil
Noah D. Radbil
Texas Bar No. 24071015
Southern District Bar No. 1069583
WEISBERG AND MEYERS, LLC
9330 LBJ Freeway, Suite 900
Dallas, TX 75243
Telephone: (888) 595-9111 ext. 275
Facsimile: (866) 565-1327
noah.radbil@attorneysforconsumers.com

Attorney-in-Charge for Plaintiff
DIERY CORONEL

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

NICOLE PAYNE,
Plaintiff

vs.

PROGRESSIVE FINANCIAL
SERVICES, INC.,
Defendant

§
§
§
§
§
§
§

CIVIL ACTION NO. 4:12-cv-00432-Y

CERTIFICATE OF SERVICE

I certify that on September 11, 2012, I electronically filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas, Fort Worth Division, using the electronic case filing system of the court. Copy of the foregoing was sent to Defendants Law Office of Vincent P. Cignarale, LLC and Vincent P. Cignarale via U.S. mail on this 11th day of September, 2012 as follows:

Robbie Malone
Robbie Malone, PLLC
8750 North Central Expressway # 1850
Dallas TX 75231

s/ Noah D. Radbil
Noah D. Radbil

CERTIFICATE OF CONFERENCE

All counsel of record have been consulted and have confirmed that Defendant does not oppose Plaintiff's Motion to Substitute Counsel. On September 11, 2012, Progressive Financial Services, Inc. provided through counsel of record Robbie Malone, an email containing their statement of no opposition. I so certify.

s/ Noah D. Radbil
Noah D. Radbil